

February 22, 2006

Ms. Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

**RE: Petition of KeySpan Energy Delivery New England for review and approval
of its Long-Range Resource and Requirements Plan for the forecast period, D.T.E. 05-68**

Dear Ms. Cottrell:

Enclosed please find the Attorney General's First Set of Document and Information
Requests in the above matter.

Sincerely,

Jamie M. Tosches
Assistant Attorney General

enclosure

cc: Andrea Saia, Hearing Officer
Service List

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

KeySpan Energy Delivery New England))))	D.T.E. 05-68
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ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's First Set of Information Requests in the above captioned proceeding.

INSTRUCTIONS

1. These Document and Information Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to KeySpan Energy Delivery New England (collectively, the "Company") or to any individual or entity sponsoring testimony or retained by the Company to provide information, advice, testimony or other services in connection with this proceeding.
2. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
3. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
4. These requests are continuing in nature and require supplemental responses when further or different information with respect to the same is obtained.
5. Each response should be furnished on a separate page headed by the individual Request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.

6. Each Document and Information Request to "Please provide all documents..." or similar phrases includes a request to "identify" all such documents. "Identify" means to state the nature of the document, the date on which it was prepared, the subject matter and the titles and the names and positions of each person who participated in the preparation of the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide 2 copies of all requested documents, even bulk responses. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.

13. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. If the response contains attachments with confidential material and the cover sheet with the request is filed separately from the public filing, provide a copy of the cover sheet with the confidential attachment.
16. The term "Company" refers to KeySpan Energy Delivery New England. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please submit responses within 10 calendar days of receiving the request, as directed by the Hearing Officer in the Ground Rules.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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KeySpan Energy Delivery New England)	
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ATTORNEY GENERAL'S FIRST SET OF
DOCUMENT AND INFORMATION REQUESTS

The following are the Attorney General's FIRST SET of DISCOVERY in the above referenced docket.

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| AG-1-1 | Refer to the Department's Order, D.T.E. 01-105, p. 45. Please provide unredacted copies of all written communications between the Company and the Department regarding the Enron capacity. |
| AG-1-2 | Please provide unredacted copies of all contracts related to the Enron capacity and include all original contracts and amendments. |
| AG-1-3 | For the period beginning with 2002 to present, please provide the Company's monthly (1) Enron capacity costs, (2) Enron capacity related costs, (3) revenues from release or sale of this capacity, and (4) volumes of gas that the Company received through its own use of the capacity to deliver supplies to the Company's customers. Please provide the Company's load factor. |
| AG-1-4 | Please provide copies of all unredacted contracts related to the Hubline capacity and include all original contracts and amendments. The contracts should clearly identify all pricing provisions. |
| AG-1-5 | For the period beginning with the in-service date of the Hubline through present, please provide the Company's monthly (1) Hubline capacity costs (2) Hubline capacity related costs, (3) revenues from any release or sale of this capacity, and (4) volumes of gas the Company received through the Company's own use of this capacity to deliver supplies to the Company's customers. Please provide the Company's load factor. |
| AG-1-6 | Refer to p. 35 of the Company's filing. Identify and explain the basis for the Company's plan to serve migrating customers? Did the Company assign all |

migrating customers recallable capacity and please explain? Please provide the Company's estimated capacity required to serve customers that have capacity assignments and include all supporting data, calculations, assumptions, and necessary explanation.

- AG-1-7 Refer to pp. 40-41 of the Company's filing. Please fully explain the Company's reason for its acquisition of ConneXion capacity. Does the Company intend to charge new transportation only customers that may seek sales service in the future for the procurement of the capacity insurance? Please explain.
- AG-1-8 Refer to pp. 41-42. Please provide copies of all affiliate unredacted contracts among the KeySpan companies that relate to the sharing and provision of gas supply, storage, and transportation resources among the affiliates and a detailed fee schedule or tariff of any fees associated with the contract arrangements.
- AG-1-9 Refer to p. 72. What percentage of the Company's total requirement must MLC provide? Please provide the amount for each year of the forecast period and include all supporting documentation, calculations, assumptions, and a brief explanation. You should incorporate the terms of the MLC agreement pending Department approval.
- AG-1-10 Refer to p. 75. Will the Company issue an RFP if it decides to extend the BP Canada, NEXEN Marketing and Imperial Inc. contracts to determine the least cost alternatives? If not, please explain why.
- AG-1-11 Refer to the last paragraph, p. 75. Provide a definition for "an extended period to maintain flexibility?"
- AG-1-12 Please state the current status of the ConneXion Project?
- AG-1-13 Please state the status of the Company's negotiations with Algonquin regarding additional capacity to serve its Cape Cod customers. Identify the amount of available additional capacity.
- AG-1-14 Explain in detail how the Company would serve its Cape Cod customers if the Algonquin extension failed to materialize.
- AG-1-15 State whether the Company has experienced any customer curtailments or outages on Cape Cod related to low pressure problems on the middle and eastern ends of Cape Cod? Please give a detailed explanation of each event that resulted in customer curtailment or outage, the number of customers affected by the event, and of the steps that the Company took to resolve each problem. Will the problems that you identified effect the Company's Service Quality performance and how?

February 22, 2006

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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KeySpan Energy Delivery New England)	
)	D.T.E. 05-68
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CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person on the service list compiled by the Secretary in D.T.E. 05-68 dated at Boston this Wednesday, February 22, 2006.

Jamie Tosches
Assistant Attorney General
Office of the Attorney General
Utilities Division
One Ashburton Place
Boston, MA 02108
(617) 727-2200